

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
_____	:	

**REVISED TRIAL EXHIBIT LIST OF DEFENDANT UNIVERSAL
PROTECTION SERVICE, LP d/b/a ALLIED UNIVERSAL SECURITY SERVICES**

Defendant Universal Protection Service, LP, d/b/a Allied Universal (“Allied”) by and through undersigned counsel, files this Second Revised Trial Exhibit List of Defendant Universal Protection Service, LP, d/b/a Allied Universal to include an additional exhibit 75.

New Ex. No.	Previous Ex. No.	DESCRIPTION	OFFER	OBJ	DATE	
					ADMIT	N/ADM
1	67	AUS Employee Handbook - All U.S. Locations <i>[AhmedAllied000010- AhmedAllied000198]</i>			05/09/25	
2	26	AUS HEB Support Structure PowerPoint <i>[AUS 00910 - AUS 00920]</i>			05/09/25	
3	93	Use of Force Wallet Card <i>[AUS 002122 - AUS 002125]</i>				
4	3	Poster - Avoid Using Force <i>[AUS 00958]</i>				
5	80	Internal Email Communication regarding Rehire Eligibility Status <i>[AUS 01009]</i>				
6	47	AUS Job Description - Human Resources Coordinator <i>[replaced with correct version AUS 002134-002137]</i>				
7	69	AUS Human Resources Org Charts as of 10/2021 <i>[AUS 001839 - AUS 001882]</i>			05/09/25	
8	78	Ahmed's Job Application with AUS <i>[AhmedAllied000479 - AhmedAllied000480]</i>			05/09/25	
9	77	Ahmed's Contingent Job Offer with AUS <i>[AhmedAllied000477 - AhmedAllied000478]</i>			05/09/25	

10	68	AUS New Employee Orientation [AUS 001615 - AUS 001802]				
11	94	Video: Steve Jones Use of Force – New Employee Orientation [AUS 002126]				
12	18	Ahmed NEO Certificate [AUS 00663]				
13	19	Ahmed Training Certification - Preventing Unlawful Discrimination & Harassment [AUS 00664]				
14	20	Ahmed Security Professional ID Badge Receipt and Acknowledgment [AUS 00665]				
15	75	Ahmed's Electronically Signed Onboarding Documents [AUS 00036, AUS 00554 - AUS 00595]			05/09/25	
16	92	Ahmed's Compliance/Training Tracker [AUS 00698-00699; AUS 002119-002121]				
17	33	TDPS Criminal History Search – Ahmed [AUS 00635 – AUS 00637; AUS 002107-002109]				
18	36	TDPS Employee Information Update Form (Ahmed) [AUS 01546]			05/09/25	
19	88	Email Communications between Ahmed and Catherine Barnes in April 2022 [AhmedAllied000435 - AhmedAllied000436]			05/09/25	

20	41	AUS Job Description - Elite Security Professional - Armed [AUS 00629 – AUS 00631]			05/09/25	
21	5	HEB Elite Team Mandatory Training [AUS 00921]				
22	25	AUS Elite Officer PowerPoint [AUS 00940 – AUS 00955]				
23	4	TMO Pocket Training Guide HEB [AUS 00956]				
24	21	PATH Basis Course Certification Forms - Multiple Employees [AUS 00653 - AUS 00654]			05/09/25	
25	64	Photographs of Ahmed [AhmedAllied000590]; all other photographs in prior Exhibit 64 withdrawn.				
26	90	HEB SP Inspection Reports [AUS 002075-002090]				
27	62	Text Messages Between MIC Kevin and Ahmed [AhmedAllied000594 - AhmedAllied000597; supplemented with AUS 002129 - AUS 002133]				
28	61	City of Bellaire CFS - Command Log [AhmedAllied000526 - AhmedAllied000536; AhmedAllied000539 - AhmedAllied000540]			05/09/25	

29	24	738 Bellaire Market Post Orders [AUS 00643]			05/09/25	
30	29	AUS Hot Sheet - AUS Security Officer Post Orders [AUS 01036 – AUS 01042]			05/09/25	
31	27	Proof of Completion of Use of Force Wallet Card [AUS 01002]				
32	44	AUS Job Description - Field Supervisor [AUS 001817 – AUS 001820]			05/09/25	
33	65	Disciplinary Notice - 2/15/2022 [AUS 00668]				
34	66	Disciplinary Notice - 4/5/2022 [AUS 00669; AUS 00670; AUS 01055]				
35	34	AUS Incident Report 4/4/2022 (written by Ahmed) [AUS 002091-2092, AUS 00674 and AUS 00672-00673, AUS 002094]				
36	82	Email communication between Alexzander Bergeron and Wayne Oliver regarding Ahmed's termination [AUS 01065]				
37	48	AUS Job Description - Client Manager [AUS 001813 – AUS 001816]			05/09/25	
38	85	Photo of Patrick Freney [AUS 002127]				

39	23	Ahmed HEB Store Officer Training Checklist Form [AUS 00644 – AUS 00652]				
40	2	Inspection Report by Chameleon Associates [AUS 00731 - AUS 00732] <i>supplemented to add AUS 001098 – AUS 001099</i>			05/09/25 in part.	
41	55	April 5, 2022 Email and attachments from Patrick Freeney [AUS 00891- AUS 00895]				
42	60	April 6, 2022 Email and attachment from Jim Grant to Patrick Freeney [AUS 00871- AUS 00890]				
43	N/A	April 6, 2022 Email from Kareem McKinnon [AUS 00845]				
44	N/A	April 7, 2022 Email from Bill King to Patrick Freeney [AUS 00836]				
45	89	April 7, 2022 Email from Patrick Freeney to Bill King, Jim Grant and Kareem McKinnon [AUS 00842- AUS 00844 which was a portion of prior Exhibit 89]				
46	1	April 7, 2022 Email and attachments from Patrick Freeney to Felicia Solis-Ramirez [AUS 00820 - AUS 00824] Former Exhibit 1 included AUS 00824				
47	N/A	April 7, 2022 Email from Felicia Solis-Ramirez to Kareem McKinnon and copy to Patrick Freeney [AUS 00830]			05/09/25 (agreed	

					as to prior version)	
48	89	April 7, 2022 Email from Bill King to Kareem McKinnon with copy to Patrick Freenev [AUS 00825 - AUS 00826] which was a portion of prior Exhibit 89				
49	1, 52	April 7, 2022 Email and attachments from Patrick Freenev to Jim Grant [AUS 00981- AUS 00985] Former Exhibit 1 included AUS 00983				
50	N/A	April 8, 2022 Email from Jim Grant [AUS 00979- AUS 00980]				
51	54, 51	April 8, 2022 Email and attachments from Bill King to Jim Grant and Patrick Freenev [AUS 00963- AUS 00971] Former Exhibit 54 was AUS 00968-00971				
52	22	Ahmed Weapon Issue/Return Form [AhmedAllied 448-449 previously misidentified as AUS 00448- AUS 00449]				
53	32	Email communication between Freenev and Hernandez regarding PAN for Ahmed on 4/14/2022 [AUS 001078 – AUS 001082]				
54	31	PAN Form - Ahmed Termination [AUS 00700 – AUS 00703]				

55	89	June 4, 2022 Email from Patrick Freeney to Wayne Oliver [AUS 001402- AUS 001403] which was a portion of prior Exhibit 89				
56	83	Email communication between Patrick Freeney and Wayne Oliver on June 10, 2022 regarding Ahmed [AUS 01165 - AUS 01166]				
57	8	Disciplinary Matrix Guidelines [AUS 00743 - AUS 00746]			05/09/25	
58	9	Legal - Use of Force and Reporting Policy [AUS 00734 - AUS 00742]			05/09/25	
59	79	Email communication between Ahmed and Alyea in May 25/26, 2022 [AUS 01267]				
60	86	Ahmed's Unemployment Application [AUS 01272]			05/09/25	
61	84	Email Communications Regarding Ahmed's Rehire Application to AUS [AUS 01220; AUS 01269 - AUS 01270]			05/09/25	
62	30	PAN Form - Freeney Separation [AUS 001906 - AUS 001909]			05/09/25	
63	56	Hotline Complaint - Case No. 36184 [AUS 00008 – AUS 00013]			05/09/25	

64	87	Ahmed's Statement to Wayne Oliver on June 8, 2022 <i>[AUS 01332 - AUS 01334]</i>			05/09/25	
65	10	2023 Ahmed's Form 1099 <i>[AhmedAllied 000658]</i>			05/09/25	
66	11	2022 Ahmed's Form 1099 <i>[AhmedAllied 000492]</i>			05/09/25	
67	13	Ahmed's Earnings Statement with Western Eagle Security (Amerom, Inc.) <i>[AhmedAllied 000646 - AhmedAllied 000653]</i>			05/09/25	
68	14	2022 Ahmed W-2 Amerom, Inc. <i>[AhmedAllied 000654]</i>			05/09/25	
69	15	2021 Ahmed W-2 Amerom, Inc. <i>[AhmedAllied 000655]</i>			05/09/25	
70	N/A	Securitas Pay Records <i>[AhmedAllied 000820-836]</i>				
71	12,16, 17	Ahmed's Earning Statement with AUS <i>[AUS 00682 - AUS 00695]</i> <i>supplementing to add AhmedAllied 656 and AUS 00627</i>			05/09/25	
72	72	Ahmed's Job Applications for 2024 <i>[AhmedAllied000485 - AhmedAllied000487; AhmedAllied000620 - AhmedAllied000644]</i>			05/09/25	

73	37	DHS Employment Eligibility Verification Form (Ahmed) [AUS 01558 – AUS 01561 and AUS 002101]			05/09/25	
74	38	Permanent Resident Card (Ahmed) [AUS 01562 – AUS 01563]			05/09/25	
75	N/A	Security Footage of April 4, 2022 Incident [AUS 002138 – AUS 002140]				

Date: August 13, 2025

MARTENSON, HASBROUCK & SIMON LLP

/s/ Jessica E. Chang

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CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2025, I caused to be filed a true and correct copy of the foregoing document using the Court's CM/ECF system that will serve notice and a copy on all counsel of record as follows:

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